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To:

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Subject: Yucca Mountain Draft EIS

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Ms. Wendy R. Dixon, EIS Program Manager Yucca Mountain Site Characterization Office Office of Civilian Radioactive Waste Management U.S. Department of Energy

Yucca Mountain Draft EIS

I am opposed to the Department of Energy recommending for approval the development of a geologic repository at Yucca Mountain to the President of the United States for the following reasons:

- 1) Groundwater upwelling and earthquakes are two issues not adequately addressed in the DEIS. DOE does not address the potential impact of dramatically higher water table levels than currently exist even though their own studies provide evidence that suggests this is an actual possibility. The DEIS states that "earthquakes have occurred in the Yucca Mountains geologic region of influence and are likely to occur in the future". Yet the DOE has repeatedly ignored the potential impacts of future earthquakes at the Yucca Mountain site and refuses to examine how an earthquake might affect the region's groundwater supply.
- 2) The DOE has not honestly characterized the potential impacts of groundwater contamination. The DOE fails to adequately identify those who would be most severely affected by radiological contamination of groundwater. The DOE must identify the maximally exposed individual (MEI) person as a fetus in the womb of a subsistence farmer in the Amargosa Valley region because this fetus would more accurately represent the individual whose health will be most at risk from groundwater contamination than an adult who lives year round in Amargosa Valley.
- 3) The DOE must, at the very least, use current growth patterns to predict an increase in population in the area and project the dose levels according to these predictions. For the DOE to assume that the population will remain the same for thousands of years is absurd and shows the fallacious nature of DOE's current analysis.
- 4) The DOE has failed to take into consideration the potential for severe health related consequences related to possible groundwater contamination. Simply denying that the groundwater will not become contaminated and that the population will not grow is not acceptable and renders the current DEIS unacceptable. Therefore, the DOE must not recommend the development of a geologic repository at Yucca Mountain.
- 5) Today there is no known solution for isolating the nation's high-level nuclear waste. Therefore it is stupid and irresponsible to rush ahead to approve a repository that we already know cannot isolate this poisonous waste for the 250,000 years that is needed to isolate this nuclear waste from the human environment. To transport this waste across our country before it is determined where, if any, geologic repository will prove tenable to hold high level nuclear waste is foolhardy and unnecessary.

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